

January 23, 2000

Mr. Steve McCoy
National Starch and Chemical Company
1515 South Drover Street
Indianapolis, IN 46221

Re: Minor Source Modification No:
097-11764-00042

Dear Mr. Steve McCoy:

National Starch and Chemical Company applied for a Part 70 operating permit on December 13, 1996 for wet corn milling operation. An application to modify the source was received on September 1, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) North Packing Line, identified as emission unit 577-2. The existing baghouse for this emission unit is being replaced by a new baghouse. The flow rate for the new baghouse will be changed from 3,835 to 15,060 standard cubic feet per minute. The emissions from this unit exhaust out stack 577-2. This emission unit was initially installed in 1979 and is proposed to be modified within the contemporaneous period for the spray agglomeration project.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (317)-327-2234, and ask for Mr. Patrick Coughlin.

Sincerely,

Robert F. Holm Ph.D
ERMD Administrator

Attachments

cc: File - ERMD
U.S. EPA, Region V
Compliance Data Section - Karen Nowak
Contract Management - Mindy Hahn
Technical Support and Modeling - Michele Boner

DRAFT

**PART 70 MINOR SOURCE MODIFICATION
OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES
MANAGEMENT DIVISION**

**National Starch and Chemical Company
1515 South Drover Street
Indianapolis, Indiana 46221**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15, IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Source Modification No.: 097-11764-00042	
Issued by: Robert F. Holm, PH.D, Administrator Indianapolis Environmental Resources Management Division	Issuance Date:

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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Indianapolis Environmental Resources Management Division (ERMD). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary source which produces feed, gluten meal, germ meal and heavy steepwater from corn.

Responsible Official: Mr. Pete Salis
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Mailing Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Phone Number: (317)-656-2232
SIC Code: 2046
County Location: Marion County
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD or Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) North Packing Line, identified as emission unit 577-2. The existing baghouse for this emission unit is being replaced by a new baghouse. The flow rate for the new baghouse will be changed from 3,835 to 15,060 standard cubic feet per minute. The emissions from this unit exhaust out stack 577-2. This emission unit was initially installed in 1979 and is proposed to be modified within the contemporaneous period for the spray agglomeration project.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. IDEM, OAM, and ERMD may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12

whenever the Permittee seeks to amend or modify this approval.

- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the

provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, and ERMD, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.9 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.10 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this approval;
 - (3) The Compliance Monitoring Requirements in Section D of this approval;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was

taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, and ERMD within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and ERMD shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM and ERMD within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and ERMD reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM and ERMD that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.12 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, and sampling required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time covered by the reading in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.13 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this approval;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating

procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.14 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) North Packing Line, identified as emission unit 577-2. The existing baghouse for this emission unit is being replaced by a new baghouse. The flow rate for the new baghouse will be changed from 3,835 to 15,060 standard cubic feet per minute. The emissions from this unit exhaust out stack 577-2. This emission unit was initially installed in 1979 and is proposed to be modified within the contemporaneous period for the spray agglomeration project.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Particulate Matter Limitation [326 IAC 6-1.1-2(a)]

Pursuant to 326 IAC 6-1.1-2(a) the filterable particulate matter emissions from emission unit 577-2 shall not exceed 0.03 grains per dry standard cubic foot of exhaust gas.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission unit 577-2 and the associated control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test emission unit 577-2 by this permit. However, IDEM or ERMD may require compliance testing when necessary to determine if these emission units are in compliance. If testing is required by IDEM or ERMD, compliance with the PM limits specified in Conditions D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM)

The Baghouse for PM control shall be in operation and control emissions from emission unit 577-2 at all times when that emission unit is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the stack exhausts for emission unit 577-2 shall be performed daily during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Parametric Monitoring For Baghouses

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with emission unit 577-2 at least once daily when the process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0 to 6 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be installed, calibrated, maintained and operated according to the manufacturer's specifications.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as a malfunction and the Permittee satisfies the requirements of the Malfunction Rule 326 IAC 1-6-2.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as a malfunction and the Permittee satisfies the requirements of the Malfunction Rule 326 IAC 1-6-2.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the stack exhausts for emission unit 577-2 .
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
 - (1) Daily records of the Inlet and outlet differential static pressure during normal operation when venting to the atmosphere.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).

- (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis Indiana 46221
Mailing Address: 1515 South Drover Street, Indianapolis Indiana 46221
Source Modification No.: 097-11764-00042

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit Minor Source Modification

Source Name:	National Starch and Chemical Company
Source Location:	1515 South Drover Street, Indianapolis Indiana 46221
County:	Marion
SIC Code:	2046
Operation Permit No.:	T097-7714-00042
Operation Permit Issuance Date:	Pending
Minor Source Modification No.:	097-11764-00042
Permit Reviewer:	Patrick Coughlin

On February 16, 2000, National Starch submitted comments on the draft Part 70 Minor Source Modification. The summary of the comments is as follows:

Comment 1:

Change the name of the Responsible official to Mr. Robert Ashton

Response to Comment 1:

ERMD has made the change requested.

Comment 2:

Condition C.9 Pressure drop gauge specifications - Since the scale of pressure gauge used by National Starch are only setup to read ½ inch increments and the full scale reading is 15 inches, National Starch has requested that the accuracy requirement be changed from ± 2% of full scale reading to ± 5% of full scale reading.

At ± 2% of full scale or 15 inches the accuracy would be ± 0.3 inches

At ± 5% of full scale or 15 inches the accuracy would be ± 0.75 inches

Response to Comment 2:

ERMD believes that the accuracy range of ± 3.3% or ±½ inch of full scale reading is reasonable since the scale reads in ½ inch increments. Therefore ERMD has revised condition C.9 to read as follows:

C.9 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall be accurate within plus or minus **one half inch or** three and three tenths percent (±3.3%) ~~two percent (2%)~~ of full scale reading.

Comment 3:

Condition C.11 Action Related to Noncompliance Demonstrated by Stack Testing - National Starch has requested that ERMD identify the regulatory cite for the requirements established in condition C.11(a).

Response to Comment 3:

OAM has authority under 326 IAC 2-7-6(6) to require this condition. OAM also has authority under 326 IAC 2-7-5.

Comment 4:

The rule cites [326 IAC 2-7-19] established in the Recordkeeping and Reporting subheading on page 9 of 15 does not appear to be correct and is not needed. National Starch requests that this rule cite be stricken from the permit.

Response to Comment 4:

The rule cite 326 IAC 2-7-19 refers to Fees and is not applicable to the condition contained under this subheading, therefore ERMD is removing the rule cite 326 IAC 2-7-19 from this subheading. The revised subheading reads as follows:

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] ~~[326 IAC 2-7-19]~~

Comment 5:

Condition C.13(d) requires that all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. National Starch requests that this condition be modified to read "all record keeping requirements not already legally required shall be implemented within ninety (90) days after startup."

Response to Comment 5:

ERMD agree that record keeping not already legally required should be implemented within 90 days after startup. Therefore ERMD has revised condition C.13(d) to read as follows:

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of ~~approval issuance~~ **after initial startup**.

Comment 6:

Condition C.14(d) requires the first report shall cover the period commencing on the date of issuance of the approval and ending on the last day of the reporting period. National Starch request the this language be changed to read "The first report shall cover the period commencing on the date of initial startup and ending on the last day of the reporting period."

Response to Comment 6:

ERMD agrees that reporting should start after initial startup for new equipment, therefore ERMD has revised condition C.14(d) to read as follows:

- (d) The first report shall cover the period commencing on the date of ~~issuance of this approval~~ **initial startup** and ending on the last day of the reporting period.

Comment 7:

Condition D.1.7 Broken or Failed Bag Detection - National Starch request that paragraph (a) of this condition be deleted from the permit since this unit is a single compartment unit.

Response to Comment 7:

ERMD understands that condition D.1.7(a) is not applicable to the baghouse identified in this approval and is therefore revising condition D.1.7 to read as follows:

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- ~~(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an malfunction and the Permittee satisfies the requirements of the Malfunction Rule 326 IAC 1-6-2.~~
- (ba) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an malfunction and the Permittee satisfies the requirements of the Malfunction Rule 326 IAC 1-6-2.

**Indiana Department of Environmental Management
Office of Air Management
and
Indianapolis Environmental Resources Management Division
Air Quality Management Section**

**Technical Support Document (TSD) for a Part 70 Minor Source
Modification.**

Source Background and Description

Source Name:	National Starch and Chemical Company
Source Location:	1515 South Drover Street, Indianapolis Indiana 46221
County:	Marion
SIC Code:	2046
Operation Permit No.:	T097-7714-00042
Operation Permit Issuance Date:	Pending
Minor Source Modification No.:	097-11764-00042
Permit Reviewer:	Patrick Coughlin

The Office of Air Management (OAM) and Indianapolis Environmental Resources Management Division (ERMD) has reviewed a modification application from National Starch and Chemical relating to the construction of the following emission units and pollution control devices:

- (a) North Packing Line, identified as emission unit 577-2. The existing baghouse for this emission unit is being replaced by a new baghouse. The flow rate for the new baghouse will be changed from 3,835 to 15,060 standard cubic feet per minute. The emissions from this unit exhaust out stack 577-2. This emission unit was initially installed in 1979 and is proposed to be modified within the contemporaneous period for the spray agglomeration project.

History

On September 1, 1999, National Starch and Chemical Company submitted applications to ERMD and OAM requesting to add a new Agglomerator facility and make changes to the North Packing Line. ERMD rolled these two projects into one permit (097-11362-00042) which is currently road blocked due to problems with the netting analysis. On 1/6/99 National Starch requested that the North Packing Line Project be issued a separate permit since it is not part of the Agglomerator Project.

Please note that the North Packing Line will be included permit 097-11362-00042 as proposed. The PM/PM-10 (assuming PM equals PM10) limits in this approval have not been changed and reflect 0.03 gr/dscf pursuant to the operating permit issued on July 13, 1990. The PM/PM10 limits

for the North Packing Line will be revised in permit 097-11362-00042 to reflect 0.01 gr/sdcf such that the net increase in emissions associated with the Agglomerator project will not exceed the PSD significance thresholds for PM and PM-10. National Starch and Chemical Company submitted a complete Part 70 permit application on December 13, 1996.

Enforcement Issue

There are enforcement actions pending associated with stack test failures on emission units 5549-1 and 5549-2. Both of these units have since been retested and show compliance with the applicable emission limitations.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temp. (°F)
577-2	North Packing Line	52	2.16	15,060	75

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 1, 1999. Additional information was received on September 21, 1999.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	12 ⁽¹⁾
PM-10	12 ⁽¹⁾
SO ₂	0
VOC	0
CO	0
NO _x	0

HAP's	Potential To Emit (tons/year)
Single HAP	less than 10
Combination of HAPs	less than 25

⁽¹⁾ The North Packing Line, identified as emission unit 577-2, is an existing unit installed in 1979 and is included in the Operating Permit issued on July 13, 1990. This unit is limited to a PM emission rate of 0.03 gr/dscf pursuant to 326 IAC 6-1.1-2(a). This approval is being issued for a modification to this unit involving the replacement of the baghouse and an increase in the stack flow rate. As a result of this modification the stack flow rate will increase from 3,835 acfm to 15,060 acfm.. Applying the new flow rate to the short term limit of

0.03 gr/dscf will result in an increase of 12 ton of PM emissions per year. Assuming PM is equal to PM-10 there will be a corresponding increase of 12 ton of PM-10 per year.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4), since the increase in the potential to emit resulting from this project is greater than 5 tons per year and less than 25 tons per year of PM/PM-10. This permit is being issued for combined construction and operating approval. This source may begin construction once this permit is approved.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM, PM-10, SO₂, NO₂, CO, Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	>250
PM10	>250
SO ₂	<100
VOC	<100
CO	<100
NO _x	>100 and <250

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) The existing source emissions have been estimated based on allowable emissions in the existing permits issued to National Starch and Chemical Company.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Table 1								
Unit ID	Description	Control Device	Previous PTE PM/PM10		New PTE PM/PM10		Change In PTE PM/PM-10	
			gr/dscf	tons/yr	gr/dscf	tons/yr	gr/dscf	tons/yr
577-4	North Packing Line Modification	Baghouse	0.03	4.37	0.03	16.96	0.03	12.59
Total emissions increase associated with the project:							12.59	
PSD Pollutant?							Yes	
Significant Emission Rate:							15	
Project Subject to Netting Analysis:							No	

Since the potential to emit of PM-10 and PM does not exceed the PSD significance thresholds of 15 ton per year of PM-10 and 25 tons per year of PM a netting analysis is not required.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than 10 tons/yr of a criteria air pollutant. Pursuant to this rule, the owner/operator of this source must submit an emission statement annually. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2 (Particulate Emissions)

The particulate emitting facilities identified in this construction permit application are subject to 326 IAC 6-1.1-2(a) (Nonattainment Particulate Matter Limitations) since the source-wide potential to emit PM exceeds 100 tons per year and the source is located in Marion County. Pursuant to 326 IAC 6-1-2(a) the filterable PM emissions from emission unit 577-2 are limited to 0.03 grains per dry standard cubic foot.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. Emission unit 577-2 has applicable compliance monitoring conditions as specified below:
 - (a) Visible emission notations of the stack exhaust for emissions unit 577-2 shall be performed daily during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the emission unit 577-2, at least once daily when the process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0 to 6 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and ERMD and shall be calibrated at least once every six (6) months.

- (d) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event

qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary to ensure the baghouse is operating properly to meet the PM emission limit required by 326 IAC 6-1.1-2(a).

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 097-11764-00042.